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March 26, 2025

VIA ECF

Honorable Renée Marie Bumb
United States District Court
Mitchell H. Cohen Building and
U.S. Courthouse
Courtroom 3D
4th and Cooper Streets
Camden, New Jersey 0810

Honorable Thomas I. Vanaskie (Ret.)
Special Master
Stevens & Lee
1500 Market St., East Tower,
Suite 1800
Philadelphia, Pennsylvania 19103

Re: ***In re Valsartan, Losartan, and Irbesartan Liability Litigation,***
Case No. 1:19-md-02875 (D.N.J.)

Dear Chief Judge Bumb and Judge Vanaskie:

Please accept this letter on behalf of Plaintiffs in advance of the March 28,
2025 case management conference.

1. Wave 3 Bellwether Cases.

The Parties are continuing to work up Wave 1 and Wave 2 bellwether cases.
They have not met and conferred on how to approach a third wave of cases, and they
should do so before presenting a joint plan or competing proposals to the Court.

Honorable Renée Marie Bumb, U.S.D.J.
Honorable Thomas I. Vanaskie (Ret.)
March 26, 2025
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2. CMO 38 Product ID Deficiencies.

Plaintiffs will be prepared to discuss these at the CMC.

3. PFS Deficiencies.

Plaintiffs will also be ready to address these at the CMC.

Respectfully,



ADAM M. SLATER

Cc: All counsel of record (via ECF)